

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

MOTIVA PATENTS, LLC,

Plaintiff,

v.

SONY CORPORATION, ET AL.,

Defendants.

CIVIL ACTION NO. 9:18-cv-00180-JRG-KFG

Lead Consolidated Case

JURY TRIAL DEMANDED

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS
FOR EXHIBITS**

Defendants Sony Corporation and Sony Interactive Entertainment Inc. (collectively “Defendants” or “Sony”) request leave to file additional pages for exhibits to Defendants’ Motion for a Protective Order Against the Deposition in the United States of Foreign Witnesses Designated to Testify with Respect to Plaintiff’s Rule 30(b)(6) Deposition Topics (the “Motion”) in excess of the page limits imposed by Judge Gilstrap’s Standing Order Regarding Discovery Disputes and Paragraph 9(b) of the Proposed Discovery Order. Dkt. 40-1.

In light of the fact-specific nature of Defendants’ Motion for a Protective Order, Defendants believe that the Court should have the relevant discovery correspondence, Interrogatories, Deposition Notices, and slip opinions in addition to the 5 pages of attachments each party is allowed to submit with its filing. Accordingly, Defendants request leave to file additional attachments to accommodate inclusion of additional evidence for the Court’s consideration, which are attached to Defendants’ Motion as follows:

- Exhibit 3
- Exhibit 3-A
- Exhibit 3-B
- Exhibit 3-C
- Exhibit 3-D
- Exhibit 3-E
- Exhibit 3-F
- Exhibit 4
- Exhibit 5

- Exhibit 6

- Exhibit 7

Dated: February 20, 2019

Respectfully submitted,

/s/ Abran J. Kean

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CERTIFICATE OF CONFERENCE

On February 20, 2019, Kelly Hughes, counsel for Defendants, communicated with Matt Antonelli, counsel for Plaintiff, as required by Local Rule 7(h). Plaintiff does not oppose this motion.

/s/Abran J. Kean

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2019, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/Abran J. Kean